

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

BELINDA BAKER, STARBORNE
PRODUCTIONS LLC, and STARBREACHER
ENTERPRISES LLC,

Plaintiffs

v.

BENSALZ PRODUCTIONS LLC, and EXCEL
SPORTS MANAGEMENT LLC,

Defendants

Case No. 1:20-cv-03342-AJN-SN

**DECLARATION OF MARK H.
MOORE IN SUPPORT OF
MOTION TO DISMISS PLAINTIFFS'
AMENDED COMPLAINT**

MARK H. MOORE hereby declares:

1. I am a partner in the law firm of Reavis Page Jump LLP, attorneys for Defendant Bensalz Productions LLC ("BSP"). I submit this declaration in support of BSP's Motion to Dismiss Plaintiffs' Amended Complaint. I am familiar with the facts alleged herein based upon my first-hand knowledge thereof or my review of the case files.

2. A true and correct copy of Plaintiffs' First Amended Complaint in this action, Dkt. No. 2 is attached hereto as **Exhibit 1**.

3. A true and correct copy of Exhibit A to the Amended Complaint, a version of the December 2011 Non-Disclosure-Confidentiality Agreement executed by Belinda R. Baker, individually, and Richard B. Bennett, Jr., individually, is attached hereto as **Exhibit 2**.

4. A true and correct copy of Exhibit B to the Amended Complaint, a November 18, 2011 Agreement between Bensalz Productions, LLC and Starbreacher Enterprises LLC, is attached hereto as **Exhibit 3**.

5. A true and correct copy of a November 4, 2012 email from Gary Rhein to Michael Skouras is attached hereto as **Exhibit 4**.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 26, 2020



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